

NRCREP - Comments of Beyond Nuclear on NRC proposed GEIS for ISR

From: <paul@beyondnuclear.org>  
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Subject: Comments of Beyond Nuclear on NRC proposed GEIS for ISR

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377

Attention:  
Chief, Rules Review and Directives Branch  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

To whom it may concern:

Attached please find the comments of Beyond Nuclear with regard to NRC proposed GEIS for In Situ Recovery (ISR) uranium mining.

Sincerely,

Paul Gunter  
Beyond Nuclear at Nuclear Policy Research Institute  
6930 Carroll Avenue Suite 400  
Takoma Park, MD 20912  
Tel. 301 270 2209  
[www.beyondnuclear.org](http://www.beyondnuclear.org)

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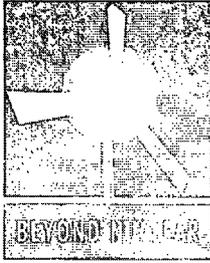
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## **Beyond Nuclear**

**6930 Carroll Avenue, Suite 400**

**Takoma Park, MD 20912**

**Tel: 301.270.2209 Fax: 301.270.4000**

**Email: [info@beyondnuclear.org](mailto:info@beyondnuclear.org)**

**Web: [www.beyondnuclear.org](http://www.beyondnuclear.org)**

September 4, 2007

Chief, Rules Review and Directives Branch  
Mail Stop T-6D59  
U.S. Nuclear Regulatory Commission  
Washington, D.C.20555-0001

Submitted by Email: [nrcprep@nrc.gov](mailto:nrcprep@nrc.gov)

### **Comments of Beyond Nuclear opposing the proposed In Situ Uranium Recovery Generic Environmental Impact Statement**

To whom it may concern:

On behalf of Beyond Nuclear I am submitting comments as provided for by the opportunity noticed in the Federal Register dated July 24, 2007 regarding the United States Nuclear Regulatory Commission's (NRC) proposed Generic Environmental Impact Statement (GEIS) for new in situ leach uranium mining projects. Beyond Nuclear is opposed to the proposed streamlining of environmental impact statements for in situ recover (ISR) uranium projects as industry now refers to them.

The process did not provide for public input on whether a GEIS is needed or desirable. As such Beyond Nuclear contends that the NRC and nuclear industry's primary reason for the proposed GEIS is to streamline the licensing process. It is unreasonable that this streamlining comes at the expense of cutting out public and independent oversight and the opportunity to hold public hearings on matters vital to protecting the environment.

None of the public meetings conducted by NRC were in or near communities potentially impacted by of the proposed ISR projects. The NRC staff is anticipating as many as 14 new license applications for uranium mining which are mostly in situ recovery projects. Beyond Nuclear contends that there were no public hearings in any of these communities to be a serious violation of due process. NRC not only ignored and denied due process by not holding public meetings reasonably close to potentially targeted communities but also entire states, such as Utah, Arizona, Colorado and South Dakota, where ISR mining is proposed. Therefore, Beyond Nuclear requests an extension of the comment period and the scheduling of additional public meetings in communities and all states potentially affected by ISR mining.

Beyond Nuclear maintains that the purpose of environmental impact statements as required by the National Environmental Policy Act (NEPA) is to provide the public an opportunity to present site specific considerations and concern. These concerns include a host of site specific characteristics including hydrology, water quality, geology, socio-economic and cultural resources. Within the context of the number of ISR sites currently under consideration in such diverse places as northwest New Mexico and south Texas, we feel that it arbitrary and capricious to attempt to evaluate these sites generically. Such significant environmental considerations can only be fairly and adequately made on a site specific basis with a site specific environmental impact statement.

Beyond Nuclear further contends that such significant environment issues be addressed under an EIS rather than by an Environmental Assessment. The standards for public participation and environmental analysis are higher for the EIS.

Sincerely,

Paul Gunter